

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1

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Attorneys for Maureen P. Steady,
as Chapter 7 Trustee

In re:

TNT RENTAL, LLC,

Debtor.

Chapter 7

Case No. 22-16751 (JNP)

**FIRST INTERIM APPLICATION FOR COMPENSATION AND
REIMBURSEMENT OF EXPENSES OF KURTZMAN | STEADY, LLC,
AS COUNSEL FOR MAUREEN P. STEADY, CHAPTER 7
TRUSTEE, PURSUANT TO 11 U.S.C. §331**

1. Kurtzman | Steady, LLC (“Applicant”), attorneys for Maureen P. Steady, Chapter 7 trustee (the “Trustee”) of the above-captioned debtor (the “Debtor”), submits its First Interim Application for Compensation and Reimbursement of Expenses (the “Application”).
2. Applicant represents the Trustee as her general counsel.
3. Applicant was appointed as the attorneys for the Trustee on September 20, 2022 effective as of August 29, 2022. A copy of the Order appointing Applicant is attached as Exhibit “A”.
4. Applicant is disinterested and has not represented or held an interest adverse to the interest of the estate on the matters on which it was employed in compliance with 11 U.S.C. §327(a).

5. The total amount of the unapproved compensation requested for attorneys' fees is Sixteen Thousand Five Hundred Eighty-Six Dollars and Fifty Cents (\$16,586.50), as set forth in the attached Exhibit "B".

6. The requested compensation is interim compensation.

7. The total out-of-pocket costs for this matter are set forth in the attached Exhibit "B" and total One Thousand Ninety-Four Dollars and Thirty-Six Cents (\$1,094.36).

8. Photocopies are billed by Applicant at the rate of twenty cents per copy, facsimiles are charged at \$1.00 per page, including long distance charges, and long-distance telephone charges, postage and computer research are billed at cost.

General Case History: The Debtor filed a voluntary chapter 7 petition on August 26, 2022 (the "Petition Date"). The Trustee was thereafter appointed as Chapter 7 trustee of the Debtors' estate, has duly qualified and is presently so acting.

9. No previous compensation of any kind has been paid to the undersigned.

10. No retainer of any nature has been paid to the undersigned.

11. The Trustee has had the opportunity to review the Application and has approved the requested amounts.

12. The identity of the individual attorney or paralegal performing the services and their respective hourly rates are as follows:

<u>Initials</u>	<u>Name</u>	<u>Capacity</u>	<u>Hourly Rate</u>
JK	Jeffrey Kurtzman	Partner	\$490.00
MPS	Maureen P. Steady	Partner	\$385.00

13. Applicant submits that, upon information and belief, there are sufficient funds in the estate to satisfy the within request for compensation and expenses.

SUMMARY OF SERVICES PROVIDED

14. As counsel for the Trustee, Applicant has performed legal services which are described as follows:

a. Applicant reviewed the Debtors' schedules of assets and liabilities and statement of financial affairs to assist the Trustee in identifying and pursuing claims and causes of action arising under Chapter 5 of the Bankruptcy Code and in liquidating those assets having value.

b. Together with the Trustee, Applicant conducted a site visit at the Debtor's business premises, met with the Debtor's counsel and principal officers, reviewed the Debtor's inventory, machinery, and equipment, analyzed the Debtor's accounts receivable, and reviewed lien search information to determine the existence, validity and perfection status of secured claims against the Debtor.

c. Applicant prepared and filed various pleadings to sell inventory and engaged in negotiations with various parties submitting purchase offers therefor, which resulted in sale proceeds for the benefit of the estate in excess of \$60,000.00.

d. In addition, Applicant prepared an auction procedures motion designed to establish guidelines for the Trustee's sale of the Debtor's inventory and equipment by means of a public auction in order to maximize the value of such assets.

e. Applicant took steps to collect the Debtor's accounts receivable, resulting in the collection of outstanding receivables without the need for litigation.

f. Applicant also analyzed potential avoidance claims arising under Chapter 5 of the Bankruptcy Code, commenced a preference action and took the steps necessary to

resolve and obtain approval for the settlement of that action, which resulted in a recovery of \$6,500.00.

g. Applicant prepared and filed a motion to reject executory contracts and unexpired leases, which was approved by this Court and which enabled the Trustee to minimize administrative expense obligations of the estate.

RELIEF REQUESTED

15. In accordance with Local Rule 2016-1(b), attached to this Application as Exhibit "B" are categorized summaries of all of the Applicant's time spent and disbursements on behalf of the Trustee from August 29, 2022 through March 15, 2023.

WHEREFORE, Kurtzman | Steady, LLC, as attorneys for the Trustee, requests that this Court enter an Order allowing interim compensation in the amount of \$16,586.50 for services rendered by Kurtzman | Steady, LLC for the period from August 29, 2022 through March 15, 2023 and reimbursement of expenses in the amount of \$1,094.36 incurred by Kurtzman | Steady, LLC for the period August 29, 2022 through March 15, 2023, and granting such other and further relief as may be just.

Dated: March 15, 2023

KURTZMAN | STEADY, LLC

By: /s/ Jeffrey Kurtzman
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